The Examiner rejected independent claims 33, 34, and 35 under 35 U.S.C. 103(a) as being unpatentable over Cukor and Reding. This rejection, as well as the rejections under 35 U.S.C. 103(a) of the dependent claims, are respectfully traversed.

As described in Applicants' specification, the present invention includes unique features at the local customer service units, such as, the option of being able to restrict users to only retrieve images that are locally stored, and not being able to access documents across the network. Specifically,

> System administrators [however,] may **restrict user workstations to only retrieve images from the local storage devices**.

Appl. Spec., p. 6, lines 24-26 (emphasis added).

This feature is not shown or suggested by Cukor. Cukor indeed teaches away from such capabilities by only referring to retrieving documents from a central source and providing very limited local memory. See col. 6, lines 43-48. Essentially, because of the limited memory, the images scanned locally are constantly replaced and thus irretrievable at the local level. This is further supported by Cukor's disclosure in col. 7, lines 21-25 that the centralized processing site forwards images to the remote stations in order to fulfill customer inquiries. Accordingly, it is respectfully submitted that the local memory limitation recited in the present claims should be accorded weight, especially in view of other recited limitations, for example, that of checking to determine if a requested document is stored locally before requesting the data from a central site. Without sufficient local memory, these other limitations would not serve a meaningful purpose.

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As noted below Applicants' specification elaborates on the context of the "escalation

scheme" of determining whether a requested document is stored locally before requesting the

data from a central site. More particularly, the present invention provides for <u>multiple formats</u>

of the same image to be stored at different locations. Therefore, different local sites may use

different image management packages, and requested images are first checked locally before

being requested from a central site. Specifically, the specification notes,

> Since the image management and data management systems are
> separate modules, users have the option of using different
> management software. Two features of the trade records
> information management system of the present invention allow this
> functionality. First, the relational database has been designed to
> **allow for multiple locations and formats of images for each
> document.** This means that the same image can be stored in
> different locations, or **even different image management
> systems.** Second, the front-end application uses specific functions
> to retrieve images. By replacing or upgrading these functions for
> different sites, different image management packages can be used.
> Additionally, the front-end image retrieval function will allow for
> an **escalation scheme to determine if an image that is not stored
> locally** should be retrieved across the network.

Appl. Spec., p. 54, lines 9-22 (emphasis added). Cukor's system does not check to determine if the

requested document is stored locally before requesting the data from the central processing site, and

therefore cannot offer advantages related to different image formats. For at least this reason, coupled

with the fact that Cukor's local memory is severely limited, Cukor does not show or suggest the

claimed limitations. Cukor simply holds images up until they are transmitted to the central

processing site as stated in column 11, lines 1-3 ("[t]he document images are retained on the

magnetic storage at the remote stations <u>until</u> the archive acknowledgment signal is received.")

(emphasis added). <u>See also</u> column 10, lines 50 - 54.

Conclusion

For the foregoing reasons, Applicants respectfully submit that the application is in

condition for allowance in view of the cited prior art. Claims 33-43 are pending. If any fees are

required in connection with this filing, the Commissioner is hereby authorized to charge Deposit

Account no. 501458.

Respectfully submitted,

Date: 3/31/03

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